

The Honorable Robert J. Bryan

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

SEATTLE PACIFIC UNIVERSITY

Plaintiff,

v.

ROBERT FERGUSON, in his official
capacity as Attorney General of Washington

Defendant.

No. 3:22-cv-05540-RJB

STIPULATED MOTION AND
[PROPOSED] ORDER TO EXTEND
DISCOVERY DEADLINES

The parties submit the following stipulation and respectfully request an extension of the deadline for submission of the Joint Status Report and Discovery Plan, as set forth below:

1. On July 2, 2024, the Court entered an Order setting the following initial discovery deadlines,

Dkt. #43:

- a. FRCP 26(f) Conference: 8/16/2024
- b. Initial Disclosures Pursuant to FRCP 26(a)(1): 8/23/2024
- c. Combined Joint Status Report and Discovery
Plan as Required by FRCP 26(f)
and Local Civil Rule 26(f): 8/30/2024

2. On July 18, pursuant to a stipulated agreement, the Court set Defendant's answer deadline for August 12, 2024.
3. The parties have conferred and Plaintiff respectfully requests an extension of the deadlines in the July 2 Order by seven (7) days to submit the Joint Status Report and Discovery Plan. The new schedule would be as follows:
 - a. FRCP 26(f) Conference: 8/23/2024
 - b. Initial Disclosures Pursuant to FRCP 26(a)(1): 8/30/2024
 - c. Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): 9/6/2024
4. Plaintiff requests this extension because the current schedule conflicts with pre-existing obligations for counsel, and the initial deadlines would provide time for review of Defendant's answer, due August 12.
5. Defendant does not oppose this request.
6. This is the parties' first request an extension of the deadlines in the July 2, 2024, Order. In 2022, the parties had previously stipulated to an extension of these deadlines during the briefing on Defendant's motion to dismiss, but those deadlines were obviated after the Court dismissed the case. Dkt. #25.
7. This extension is sought in good faith and not for purposes of undue delay.

[SIGNATURES ON NEXT PAGE]

Respectfully submitted this 1st day of August, 2024.

/s/ Daniel J. Jeon

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[PROPOSED] ORDER

Having considered the Stipulated Motion filed by the parties, and good cause appearing there-
fore, the Court hereby orders that the deadline for submission of the Joint Status Report and Dis-
covery Plan is extended by seven (7) days.

The schedule is now as follows:

- a. FRCP 26(f) Conference: 8/23/2024
- b. Initial Disclosures Pursuant to FRCP 26(a)(1): 8/30/2024
- c. Combined Joint Status Report and Discovery
Plan as Required by FRCP 26(f)
and Local Civil Rule 26(f): 9/6/2024

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: August __, 2024

The Honorable Robert J. Bryan
United States District Judge